

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
Request for Declaratory Ruling on)	File No. <u>07-121</u>
Compliance of Fixed Microwave)	
Antennas Having Distributed)	
Radiating Elements)	

REQUEST FOR DECLARATORY RULING

A. Introduction

Recent advances in antenna system design enable a Fixed Services licensee to use otherwise unavailable spectrum, without causing interference to other users, through the use of antennas having distributed radiating elements.

Pursuant to Section 1.2 of the Commission's Rules, Wireless Strategies, Inc. respectfully asks the Commission to issue a declaratory ruling confirming that a Fixed Service licensee is permitted to simultaneously coordinate multiple links whose transmitter elements collectively comply with the Commission's antenna standards¹ and frequency coordination procedures.² The requested ruling is needed to eliminate any uncertainty as to the lawfulness of these methods for enhancing spectrum efficiency by allowing a licensee to reuse the licensed spectrum in a given area.

D. Request for Ruling

Wireless Strategies seeks a ruling that a licensee may use antennas having distributed elements to operate links, in addition to the main link, subject to conditions that (1) all radiating elements together conform to the applicable antenna radiation pattern in Section 101.115, and (2) all links are successfully coordinated

¹ 47 C.F.R. Sec. 101.115.

² 47 C.F.R. Sec. 101.103.

Request for Declaratory Ruling

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[2]

Wireless Strategies Inc.

Request for Declaratory Ruling

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Rule 101.103

Supports Innovation

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Rule 101.103 (2) (d) (ix)

“If, after coordination is successfully completed, it is determined that a subsequent change could have no impact on some parties receiving the original notification, these parties must be notified of the change and of the coordinator’s opinion that no response is required.”

Request for Declaratory Ruling



Wireless Strategies Inc.

Summary